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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VALERIE TORRES and RHONDA HYMAN,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

PRUDENTIAL FINANCIAL, INC.,
ACTIVEPROSPECT, INC., and
ASSURANCE IQ, LLC,

Defendants.

Case No. 3:22-cv-07465-CRB

**~~JOINT STIPULATION TO MODIFY THE
CURRENT CASE DEADLINES AND
[PROPOSED] ORDER~~**

Judge: Hon. Charles R. Breyer

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Valerie Torres and Rhonda Hyman (“Plaintiffs”) and Defendants Prudential Financial, Inc., ActiveProspect, Inc., and Assurance IQ, LLC (“Defendants”) (together, the “Parties”), by and through their respective counsel of record, jointly stipulate and agree, subject to the Court’s approval, to amend certain deadlines applicable in the above-captioned cases:

WHEREAS, on July 10, 2024, Defendants served a notice of deposition to Plaintiffs’ expert, Zubair Shafiq, for August 2, 2024;

WHEREAS, Plaintiffs informed Defendants that Dr. Shafiq was not available for deposition on August 2 or on Defendants’ proposed alternative date of July 29, 2024, and that Dr. Shafiq had limited availability in early August;

WHEREAS, between July 11 and July 17, 2024, the Parties met and conferred regarding the date of Dr. Shafiq’s deposition and determined that the earliest date that all parties are available for the deposition of Dr. Shafiq is August 30, 2024;

WHEREAS, Defendants’ opposition to class certification is currently due on August 28, 2024 (Dkt. 46);

WHEREAS, to allow Defendants sufficient time to depose Dr. Shafiq and to prepare their opposition to class certification following the deposition of Dr. Shafiq, the parties agree and respectfully request that the Court modify the case schedule as follows:

Event	Current Date	Proposed Deadline
Defendant’s opposition to motion for class certification	August 28, 2024	September 25, 2024
If Defendants support their Opposition to Class Certification with expert reports or testimony, Defendants’ experts available for depositions	Within 20 days following the filing of Defendants’ Opposition	Within 20 days following the filing of Defendants’ Opposition
Plaintiffs’ reply in support of motion for class certification	September 27, 2024	October 25, 2024
Hearing on Motion for Class Certification	October 18, 2024, at 10 a.m. or as soon thereafter as is convenient for the Court	November 15, 2024, at 10 a.m. or as soon thereafter as is convenient for the Court

Event	Current Date	Proposed Deadline
Deadline to Amend the Complaint Regarding Class Certification Matters	30 days after ruling on class certification	30 days after ruling on class certification
ADR	30 days after ruling on class certification	30 days after ruling on class certification
Close of Fact Discovery	November 27, 2024	December 18, 2024
Exchange Opening Expert Reports	December 20, 2024	January 27, 2025
Exchange Rebuttal Expert Reports	February 25, 2025	March 25, 2025
Close of Expert Discovery	March 25, 2025	April 22, 2025
Motions for summary judgment and <i>Daubert</i> motions	May 6, 2025	June 3, 2025
Responses to motions for summary judgment and <i>Daubert</i> motions	June 20, 2025	July 18, 2025
Replies in support of motions for summary judgment and <i>Daubert</i> motions	July 18, 2025	August 15, 2025
Hearing on motions for summary judgment and <i>Daubert</i> Motions	August 15, 2025, at 10 a.m., or as soon thereafter as is convenient for the Court	September 12, 2025, at 10 a.m., or as soon thereafter as is convenient for the Court
Final Pretrial Conference	TBD	TBD
Jury Trial	TBD	TBD

NOW, THEREFORE, the parties, subject to the Court's approval, hereby stipulate, agree, and respectfully request that the Court enter the following schedule:

Event	Current Date	Proposed Deadline
Defendant's opposition to motion for class certification	August 28, 2024	September 25, 2024
If Defendants support their Opposition to Class Certification with expert reports or testimony, Defendants' experts available for depositions	Within 20 days following the filing of Defendants' Opposition	Within 20 days following the filing of Defendants' Opposition
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Final Pretrial Conference	TBD	TBD
Jury Trial	TBD	TBD

IT IS SO STIPULATED.

DATED: July 18, 2024

By: /s/ Simon Grille

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Attorneys for Plaintiffs

1 DATED: July 18, 2024

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15 *Attorneys for Defendants Prudential*
16 *Financial, Inc. and ActiveProspect, Inc. and*
17 *Assurance IQ, LLC*

18 **~~PROPOSED~~ ORDER**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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21 Dated: July 22, 2024

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23 HONORABLE CHARLES R. BREYER
24 UNITED STATES DISTRICT JUDGE
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